

**From:** [Barbara Nann](#)  
**To:** [Carl Bolden](#); [Barbara Aldridge](#)  
**Subject:** Fw: Comments on the Draft Agenda for January 16th Meeting with You  
**Date:** 01/09/2008 10:27 AM

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Barbara A. Nann  
Assistant Regional Counsel  
EPA Region 6 (6RC-S)  
1445 Ross Avenue  
Dallas, TX 75202  
phone: (214) 665-2157  
fax: (214) 665-6460  
[nann.barbara@epa.gov](mailto:nann.barbara@epa.gov)

----- Forwarded by Barbara Nann/R6/USEPA/US on 01/09/2008 10:26 AM -----

**Mark  
Peycke/R6/USEPA/US**

To Barbara Nann/R6/USEPA/US@EPA  
cc

01/07/2008 02:37 PM

Subject Fw: Comments on the Draft Agenda for January 16th Meeting with You

fyi

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Mark Peycke, Chief  
Superfund Branch  
Office of Regional Counsel  
United States Environmental Protection Agency, Region 6  
214.665.2135

----- Forwarded by Mark Peycke/R6/USEPA/US on 01/07/2008 02:38 PM -----

**Donald  
Williams/R6/USEPA/US**

To Sam Coleman/R6/USEPA/US@EPA, Mark  
Peycke/R6/USEPA/US@EPA

cc

01/04/2008 12:22 PM

Subject Comments on the Draft Agenda for January 16th Meeting with You

Sam, Mark:

I've reviewed the agenda and spoken to the Gary Miller (the RPM) about the site. I think we all want to move forward and get to actual remedial work as quickly as

possible, and I think that removals can get the PRPs to a point where the site can be redeveloped. However, I have a couple of issues related to the agenda and the approach that the PRPs want to take toward completing the cleanup at Gulfco.

My first concern is related to ground water. Ground water contamination from the site has been found in deeper aquifers and has not been completely characterized. The presence of contamination in deeper ground water necessitates further investigation of extent of contamination and potential receptors. The presence of contamination in deeper ground water also raises questions regarding the adequacy of the closure of the former waste impoundment. Without knowing the extent of the contamination, we can't say that a No Action Remedy or Institutional Controls to prohibit ground water use will be appropriate for the ground water remedy. I also don't believe that the PRPs could design and implement an adequate ground water remedy this fiscal year. Because of the ground water questions that remain to be answered and the probability that some construction will be needed to address ground water contamination, I don't believe that Construction Completion is realistic this fiscal year.

My second concern is related to Natural Resource Trustee issues and the wetlands surrounding the site. The agenda doesn't mention anything about possible wetlands impacts.

My third concern is related to site bifurcation. I believe that the entire site should remain under Superfund authority and not be split between Superfund and the State Voluntary Cleanup Program. I believe that the PRPs can conduct removals under Superfund that will make the site available for reuse. We would have to set adequately protective cleanup levels, probably more stringent than would be selected based on a complete risk assessment. Upon completion of an adequate surface cleanup, we could consider a partial deletion for the site surface.

My fourth concern relates to the people in the vicinity of the site who are watching the site activities very closely. We need to make sure that we follow the NCP and not inadvertently create a perception that the cleanup is somehow less than adequate or that we didn't follow our own process.

As an aside, Scott Sherman was sent a copy of the agenda at the same time we got it. Scott asked Barnes Johnson to look into the need for HQ assistance at Gulfco. Gary Miller got a call from an OSRTI staff person this morning asking for conference call next week. Rafael Gonzalez and probably John Smith will likely be on the call. Barnes thinks the best approach now is for HQ to let us handle the site and have HQ stay silent. Gary is going to brief me on the whole site next Tuesday morning. At this point, we are planning a call with OSRTI for Wednesday or Thursday next week, after Barbara Nann (site attorney) gets back from leave.

Don Williams  
Deputy Associate Director  
Superfund Remedial Branch  
EPA Region 6  
(214) 665-2197

▼ [Sam Coleman/R6/USEPA/US](#)

**Sam  
Coleman/R6/USEPA/US**

To "Mark Peycke" <Peycke.Mark@epamail.epa.gov>,  
"Donald Williams"  
<Williams.Donald@epamail.epa.gov>

01/02/2008 05:50 PM

cc

Subject Fw: Draft Agenda for January 16th Meeting with You

Let know if yoi see issues.  
Samuel Coleman, PE  
Superfund Div Region 6  
214.665.6701 Ofc  
214.789.2016 Cell  
Sent by EPA Wireless E-Mail Services

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----- Original Message -----

**From:** "Kilpatrick, Steve (SC)" [SKilpatrick@dow.com]  
**Sent:** 01/02/2008 01:12 PM EST  
**To:** Sam Coleman  
**Subject:** Draft Agenda for January 16th Meeting with You

Sam - Hope you and your family had a great Christmas and New Year, as well as some well deserved time off. Attached is a draft agenda for your consideration for our meeting on the 16th in Dallas. If you have any thoughts, please give me a ring or send me an e-mail. I believe our project manager has forwarded a copy to Gary Miller also.

I was asked last week to attend a meeting with Dan Eden and Alan Batcheller of TCEQ to provide them an update on activities at the site. In addition to the activities, we briefly discussed our upcoming meeting with you. Dan reiterated that any decisions on future plans for the site were obviously in EPA's court, which we of course know.

Give me a call if you need anything from me (i.e., the group.)

Take care,

*Steve Kilpatrick*

S. C. Kilpatrick

EH&S Regulatory Affairs Manager - Texas/ Arkansas

The Dow Chemical Company

(979) 235-0065 Cell (preferred)

(512) 472-5995

(512) 472-6771 FAX

skilpatrick@dow.com [attachment "DRAFT AGENDA - 1-16-08.doc"  
deleted by Donald Williams/R6/USEPA/US]